

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

*Plaintiff,*

*v.*

MOSHE LAX, individually, as an executor of  
the Chaim Lax Estate, as a trustee of the Chaim  
Lax Family Trust, and as a trustee of the GAMA  
Trust; ZLATY SCHWARTZ, individually, as  
executor of the Chaim Lax Estate, as trustee of the  
Chaim Lax Family Trust, and as a trustee of the  
GAMA Trust; SHAINDY LAX; JUDITH LAX;  
J.L., a minor; 299 HEWES STREET REALTY  
CORP; 307 HEWES STREET REALTY CORP;  
JBAM REALTY LLC, a/k/a JBAM REALTY 2  
LLC; BEN ZION JACOBOWITZ; TOBY  
JACOBOWITZ; SL HOLDINGS I, LLC;  
SL HOLDINGS II, LLC; SL HOLDINGS III, LLC;  
SL HOLDINGS IV, LLC; SL HOLDINGS V, LLC;  
DIAMOND DYNAMICS LLC; KGK JEWELRY  
LLC; CONGREGATION BAIS YEHUDAH  
D'GANITCH; LX HOLDINGS LLC;  
MORRIS SCHLAGER; GITTY SCHLAGER;  
JOSEPH GREEN; HANNAH GREEN;  
HENNY GREEN; and HERSHI GREEN,

*Defendants.*

No. 1:18-cv-04061

**Stipulation**

WHEREAS, the plaintiff United States of America commenced this action on July 16, 2018 to collect certain unpaid federal income and estate tax liabilities owed by the Estate of Chaim Lax (the "Estate") and set aside certain fraudulent transfers of the Estate's assets, among other things;

WHEREAS on December 13, 2018, the plaintiff United States served its First Requests for Production on the defendant Moshe Lax;

WHEREAS, the United States and Moshe Lax agree that Moshe Lax is in possession of emails that are potentially responsive to the United States' requests for production, and wish to agree on terms for the review and production of such emails;

NOW, THEREFORE, the plaintiff United States of America, by and through its undersigned counsel, and the defendant Moshe Lax, stipulate and agree as follows:

1. Moshe Lax will produce all non-privileged email in his Gmail account to the United States by following Steps 1 through 4 of the "Email Search and Production Protocol" set out in Exhibit 1, using the Privilege Search Terms set out in Exhibit 2.

2. Moshe Lax will review the emails withheld for privilege and produce a privilege log, along with any emails determined to be not privileged, following Steps 5 and 6 of the Email Search and Production Protocol.

3. Moshe Lax understands the Email Search and Production Protocol and agrees to follow each step therein. The United States agrees to provide technical guidance to Moshe Lax if needed to complete the Email Search and Production Protocol.

4. The United States will search the emails that Moshe Lax produces for responsiveness by running searches for the following categories of search terms, which are defined in Exhibit 3:

- a. Bank Accounts
- b. Entities
- c. Transactions
- d. Litigation
- e. Assets
- f. Witnesses and (all other categories, including Conduct)

5. In running the searches set out in paragraph 4, the United States may employ “fuzzy searching” to locate documents that contain misspelled search terms.

6. The United States will review and use in litigation only those emails that are responsive to the searches set out in paragraph 4, reserving the right to perform further searches subject to the parties’ agreement or court approval.

7. In the event of a dispute over the process described above, either party may submit this Stipulation to the Court in order to seek Court intervention.

Dated: August \_\_, 2019

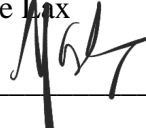
August 28, 2019

Plaintiff United States of America

Defendant Moshe Lax

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\_\_\_\_\_  
MOSHE LAX  
1653 58th Street  
Brooklyn, NY 11204



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